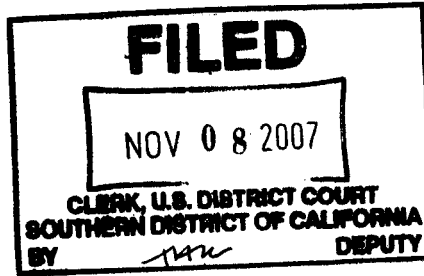


USA



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ivan FLORES

Defendant.

Magistrate Case No.: '07 MJ 89 11

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about November 7, 2007, within the Southern District of California, defendant Ivan FLORES did knowingly and intentionally import approximately 66.80 kilograms (146.96 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached statement of facts incorporated herein by reference.


Special Agent
U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence this 8th day of November 2007.


Peter C. Lewis
United States Magistrate Judge

UNITED STATES OF AMERICA

v.
Ivan FLORES

STATEMENT OF FACTS

This complaint is based on the reports and documents furnished to U. S. Immigration and Customs Enforcement Special Agent Russell H. Vensk Jr. and the interview of Ivan FLORES.

On November 7, 2007, at approximately 0520 hours, FLORES, a U.S. citizen, entered the U.S. at the Calexico, Ca. West Port of Entry from Mexico. FLORES was the driver and sole occupant of a 1990 Ford F-150 pick-up truck that had a camper shell attached to the bed.

At primary, Customs & Border Protection Officer (CBPO) Hadley Newgent detected a false compartment built into the roof of the camper shell. CBPO Newgent escorted FLORES and the vehicle to secondary inspection.

In secondary, CBPO Michael Hedlund discovered packages concealed in a specially built compartment within the roof of the camper shell. CBPO Hedlund probed one of the packages and extracted a green leafy substance, which he field-tested and which gave a positive indication for the presence of marijuana. CBPO Hedlund and CBPO Annette Zuniga removed a total of thirty-six packages from the compartment. The packages had a total weight of 66.80 kgs. (146.96 lbs.)

FLORES was advised of his Miranda rights by SA Vensk. FLORES stated he understood his rights and agreed to answer questions without the presence of an attorney. FLORES stated he knew there was marijuana concealed in the truck when he entered the U.S. and knew it was illegal to import marijuana into the U.S. FLORES stated he made arrangements to smuggle the marijuana into the U.S. and was to be paid \$2500.00 to deliver the marijuana to an unknown location near Los Angeles, Ca.